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8

9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 2007-269

13 SUSIE ARGUELLO,
a.k.a. SUSIE M. ARGUELLO
14 4118 Chris Drive
Abilene, TX 79606

A C C U S A T I O N

15 Registered Nurse License No. 597236

16 Respondent.
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18 Complainant alleges:
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20 **PARTIES**

21 1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation
solely in her official capacity as the Executive Officer of the Board of Registered Nursing
22 ("Board"), Department of Consumer Affairs.

23 2. On or about April 2, 2002, the Board issued Registered Nurse License
24 Number 597236 to Susie Arguello, also known as Susie M. Arguello ("Respondent").
25 Respondent's registered nurse license was in full force and effect at all times relevant to the
26 charges brought herein and will expire on July 31, 2007, unless renewed.
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1 Examiners in the disciplinary proceeding titled *In the Matter of License Number 668745 issued*
2 *to SUSIE ARGUELLO*, Respondent voluntarily surrendered her license to practice registered
3 nursing in the state of Texas^{1/}. A true and correct copy of the Agreed Order is attached as exhibit
4 "A" and incorporated herein by reference.

5 **PRAYER**

6 WHEREFORE, Complainant requests that a hearing be held on the matters herein
7 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 8 1. Revoking or suspending Registered Nurse License Number 597236, issued
9 to Susie Arguello, also known as Susie M. Arguello;
- 10 2. Ordering Susie Arguello, also known as Susie M. Arguello, to pay the
11 Board of Registered Nursing the reasonable costs of the investigation and enforcement of this
12 case, pursuant to Business and Professions Code section 125.3; and
- 13 3. Taking such other and further action as deemed necessary and proper.

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15 DATED: 4/10/07

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18 
19 RUTH ANN TERRY, M.P.H., R.N.
20 Executive Officer
21 Board of Registered Nursing
22 Department of Consumer Affairs
23 State of California
24 Complainant

25 03579110-SA2006102310
26 Arguello, Susie.acc.wpd
27 clp; 3/16/07

28 1. The Agreed Order also provided that Respondent would be allowed to petition for reinstatement of
licensure after one year had elapsed from the date of the Order and she had obtained objective, verifiable proof of
twelve (12) consecutive months of sobriety immediately proceeding the petition.